

UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:
FTX Trading Ltd. ,
Debtors.

Case No.: 22-11068-JTD
Chapter: 11

FILED
2025 FEB 20 PM 12:34
CLERK
US BANKRUPTCY COURT
DISTRICT OF DELAWARE

Response to the Debtors' Objection to Late-Filed Claim

Claimant: Ilhan UZUN
Claim Number: 97969
Amount of Claim: 8.000.000 USD

I. INTRODUCTION

I, Ilhan UZUN, respectfully submit this response to the Debtors' objection regarding my late-filed claim. I contest the rejection of my claim and request the Court to reconsider its determination based on the following grounds.

II. FACTUAL BASIS FOR THE CLAIM

1. I suffered the loss of a substantial amount of cryptocurrency/financial assets due to platform failure and fraud.
2. I took prompt action by contacting the relevant authorities and following their instructions, including the **9-step process** outlined by the Debtors.
3. Unfortunately, due to technical issues and incorrect instructions, I was unable to submit the proof of claim before the deadline.
4. Despite my efforts to comply with the claims process, my claim was rejected solely due to late submission, without consideration of my valid reasons and the merits of my claim.

III. LEGAL ARGUMENTS IN OPPOSITION TO THE OBJECTION

1. **Excusable Neglect:** Under **Bankruptcy Rule 9006(b)(1)**, courts have discretion to permit late claims if the delay was due to excusable neglect. Factors courts consider include:
 - o The danger of prejudice to the debtor;
 - o The length of the delay and its potential impact on judicial proceedings;
 - o The reason for the delay, including whether it was within the claimant's control; and
 - o Whether the claimant acted in good faith.Given that my delay was unintentional and I acted in good faith to comply with

the claims process, my claim should not be dismissed solely due to procedural technicalities.

2. **Fundamental Fairness and Due Process:** Courts have ruled that claimants should not be unfairly prejudiced due to administrative or procedural issues beyond their control. Rejecting my claim without considering its merits violates the principles of fairness.
3. **Substantial Compliance with the Claims Process:** Although my proof of claim was late, I complied with other aspects of the process. My actions demonstrate a clear intent to claim my funds, and the rejection solely based on timing does not serve justice.

IV. EVIDENCE SUPPORTING MY CLAIM

Attached to this response are documents supporting my claim, including but not limited to:

- **Transaction records** showing my assets;
- **Correspondence** with the authorities regarding the claims process;
- **Any proof of the 9-step process** I followed;
- **Any mitigating factors** that prevented me from filing on time

V. CONTACT INFORMATION

Claimant: İlhan UZUN

Address: Mehmet Akif Street, Selcuklu / Konya, Türkiye

Phone Number: 0545 637 14 91

Email: beyaz_mendil_55@hotmail.com

If necessary, I am willing to negotiate a resolution or provide additional evidence to support my claim.

VI. CONCLUSION

For the reasons stated above, I respectfully request that the Court reconsider the rejection of my claim and allow my late-filed claim to be considered on its merits.

Respectfully submitted,

İlhan UZUN

19.02.2025



ADIM 1

Hesap Sahibi Kimlik Doğrulasını Başlat

FTX hesabınıza erişmek için, FTX Borsaları kapatılmadan önce yaptığınız gibi aynı 2FA'yı kullanarak FTX kimlik bilgilerinizle giriş yapmanız gerekecektir.



ADIM 2

Orijinal FTX Hesap Sahibinin Kimliğini Doğrulama

Kayıtlardaki e-posta adresinizin doğruluğundan emin olmak için lütfen bir onay e-postası talep ederek doğrulama sürecini başlatın. Onay e-postasını aldıktan sonra, doğrulamayı tamamlamak için lütfen ekteki bağlantıya tıklayın.



ADIM 3

KYC

Orijinal FTX hesap sahibinin kimliğini doğrulamak için Müşterini Tanı (KYC) sürecini tamamlayın. Bu adım, hesabın yönetmeliklere uygun olmasını sağlar ve kimliğinizin doğrulanmasına yardımcı olur.



ADIM 4

Hesap Bakiyelerini Görüntüleyin

FTX hesabınızı görüntüleyin -- Dilekçe Tarihi itibariyle bakiyelerinizi (aksi belirtilmedikçe) ve geçmiş faaliyetlerinizi görüntüleyebilirsiniz.

ADIM 5

Talep Kanıtı Durumunuzu Görüntüleyin

claims.ftx.com



21:04

4G



29 Ocak

18:41



görüntüleyebilirsiniz.



ADIM 5

Talep Kanıtı Durumunuzu Görüntüleyin

Müşteri Son Tarihi Kararı uyarınca talep kanıtınızı sunmanız için verilen süre sona ermiştir. Müşteriler ve alacaklılar bu adımda taleplerinin durumunu görüntüleyebilirler. Müşteriler ve alacaklılar taleplerini doğrudan Kroll üzerinden sunabilir veya değiştirebilirler.



ADIM 6

Oylama

Vote - Proceed to Kroll



ADIM 7

Dağıtımlar - Vergi Gereklilikleri

IRS Form W-9'u veya uygun olan IRS Form W-8'i Tamamlayın / Gönderin.



ADIM 8

Dağıtımlar: Sağlayıcı Seçin

ADIM 9

Dağıtım Tutarları - Özet

Çok yakında

21:04

4G



23 Eylül 2023

16:13



Bakiyeler Yatırma Çekimler Pozisyon

Bakiyeler



Sıfır bakiyeyi gizle

Para Birimi

Tüm Alt
Hesapların
Bakiyesi

USD (USD)

-1,28

ChainLink
Token (LINK)

0,0409

3X Short

Cardano
Token
(ADABEAR)

27.491.130,070274

Ethereum
(ETH)

0,0001289

3X Short

Algorand
Token
(ALGOBEAR)

107.118

Ethereum
(Proof of
work)
(ETHW)

0,0001289

3X Short

Chainlink
Token

19.996

21:05

4G



10 Kasım 2024
14:48



Hesap Kimliği 3233201

Unique Customer Code 223243

E-posta beyaz_mendil_55@hotmail.com

Platform FTX_COM

Gizlilik

SSS

Destek

Kullanıcı Kılavuzu

🇹🇷 Türkçe

Ayarlar

Çıkış Yap



7.03.2021 20:08:17	ETH	0,0601976 ETH
26.02.2021 19:03:49	ETH	0,06137251 ETH
12.02.2021 22:56:29	ETH	0,07708133 ETH
6.09.2020 08:59:33	ETH	0,40347746 ETH
13.07.2020 17:31:22	LINK	27,6409 LINK
28.05.2020 16:54:00	LINK	306,4621 LINK

Sayfa başına satır sayısı: 15 ▼ 1-7 / 7

Core Transactions

Kullanıcının ana hesabı veya seçili olan alt hesabı için işlemler indirilecektir. Bu indirme, ek bakiye düzeltmelerini içermeyebilir. Lütfen bunları düzeltmeler sekmesinden indirin.

İndir

7.03.2021 20:08:17	ETH	0,0601976 ETH
26.02.2021 19:03:49	ETH	0,06137251 ETH
12.02.2021 22:56:29	ETH	0,07708133 ETH
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Sayfa başına satır sayısı: 10 ▼ 1-7 / 7

Core Transactions

Kullanıcının ana hesabı veya seçili olan alt hesabı için işlemler indirilecektir. Bu indirme, ek bakiye düzeltmelerini içermeyebilir. Lütfen bunları düzeltmeler sekmesinden indirin.

İndir

21:11

4G

23 Eylül 2023

16:13

Bakiyeler Yatırma Çekimler Pozisyon

Bakiyeler



Sıfır bakiyeyi gizle

Para Birimi

Tüm Alt
Hesapların
Bakiyesi

USD (USD)

-1,28

ChainLink
Token (LINK)

0,0409

3X Short
Cardano
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0,0001289

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Token
(ALGOBEAR)

107.118

Ethereum
(Proof of
work)
(ETHW)

0,0001289

3X Short
Chainlink
Token

19.996

21:11

4G



22 Eylül 2023
21:58



Hesap Kimliği 3233201

E-posta beyaz_mendil_55@hotmail.com

Platform FTX_COM

Gizlilik

SSS

Destek

🇹🇷 Türkçe

Ayarlar

Çıkış Yap



18:00

4G

22 Ocak

21:15

Form **W-8BEN**

(Rev. October 2021)

Department of the Treasury
Internal Revenue Service**Certificate of Foreign Status of Beneficial Owner for United States Tax Withholding and Reporting (Individuals)**

- For use by individuals. Entities must use Form W-8BEN-E.
► Go to www.irs.gov/FormW8BEN for instructions and the latest information.
► Give this form to the withholding agent or payer. Do not send to the IRS.

OMB No. 1545-1621

Do NOT use this form if:

- You are NOT an individual **W-8BEN-E**
- You are a U.S. citizen or other U.S. person, including a resident alien individual **W-9**
- You are a beneficial owner claiming that income is effectively connected with the conduct of trade or business within the United States (other than personal services) **W-8ECI**
- You are a beneficial owner who is receiving compensation for personal services performed in the United States **8233 or W-4**
- You are a person acting as an intermediary **W-8IMY**

Instead, use Form:

Note: If you are resident in a FATCA partner jurisdiction (that is, a Model 1 IGA jurisdiction with reciprocity), certain tax account information may be provided to your jurisdiction of residence.

Part I Identification of Beneficial Owner (see instructions)

1 Name of individual who is the beneficial owner ILHAN UZUN	2 Country of citizenship Turkey
3 Permanent residence address (street, apt. or suite no., or rural route). Do not use a P.O. box or in-care-of address. Turkcan Street Ekko Apartment 32/2 City or town, state or province. Include postal code where appropriate. Konya 42250	
4 Mailing address (if different from above) Turkcan Street Ekko Apartment 32/2 City or town, state or province. Include postal code where appropriate. Konya 42250	
5 U.S. taxpayer identification number (SSN or ITIN), if required (see instructions)	

6a Foreign tax identifying number (see instructions)	6b Check if FTIN not legally required <input type="checkbox"/>
7 Reference number(s) (see instructions) TR23 0004 6002 2188 8000 1731 70 Adabear Coin.	8 Date of birth (MM-DD-YYYY) (see instructions) 06-01-1985

Part II Claim of Tax Treaty Benefits (for chapter 3 purposes only) (see instructions)

- 9** I certify that the beneficial owner is a resident of Turkey within the meaning of the income tax treaty between the United States and that country.
- 10** **Special rates and conditions** (if applicable—see instructions): The beneficial owner is claiming the provisions of Article and paragraph _____ of the treaty identified on line 9 above to claim a _____ % rate of withholding on (specify type of income): _____
- Explain the additional conditions in the Article and paragraph the beneficial owner meets to be eligible for the rate of withholding: _____

Part III Certification

Under penalties of perjury, I declare that I have examined the information on this form and to the best of my knowledge and belief it is true, correct, and complete. I further certify under penalties of perjury that:

- I am the individual that is the beneficial owner (or am authorized to sign for the individual that is the beneficial owner) of all the income or proceeds to which this form relates or am using this form to document myself for chapter 4 purposes;
- The person named on line 1 of this form is not a U.S. person;
- This form relates to:
 - (a) income not effectively connected with the conduct of a trade or business in the United States;
 - (b) income effectively connected with the conduct of a trade or business in the United States but is not subject to tax under an applicable income tax treaty;
 - (c) the partner's share of a partnership's effectively connected taxable income; or
 - (d) the partner's amount realized from the transfer of a partnership interest subject to withholding under section 1446(f);
- The person named on line 1 of this form is a resident of the treaty country listed on line 9 of the form (if any) within the meaning of the income tax treaty between the United States and that country; and
- For broker transactions or barter exchanges, the beneficial owner is an exempt foreign person as defined in the instructions.

Furthermore, I authorize this form to be provided to any withholding agent that has control, receipt, or custody of the income of which I am the beneficial owner or any withholding agent that can disburse or make payments of the income of which I am the beneficial owner. I agree that I will submit a new form within 30 days if any certification made on this form becomes incorrect.

Sign Here ☐ I certify that I have the capacity to sign for the person identified on line 1 of this form.

Ilhan

Digitally signed by ILHAN on 2025-01-22 21:14:49 +03:00

Signature of beneficial owner (or individual authorized to sign for beneficial owner)

Ilhan Uzun

Print name of signer

01-22-2025

Date (MM-DD-YYYY)

20:28

4G



##- Lütfen yanıtınızı bu satırın üzerine yazın -##

Your request (37319) has been updated. To add additional comments, reply to this email.



Nicole (Please use claims.ftx.com)

1 Ağu 2023 10:42 GMT-7

Hello ilhan,

Thanks for reaching out.

To electronically file customer proofs of claims,
please visit <https://claims.ftx.com/>

You may also refer to the article below for more
information and a step-by-step guide:

<https://ftexchange.zendesk.com/hc/en-us/articles/16738866768788-Filing-a-Customer-Claim>

Thanks,
FTX Customer Support



ilhan uzun

29 Tem 2023 04:18 GMT-7

??



Tümünü Yanıtla



Posta



Takvim



Uygulamalar

20:30

4G

**ilhan uzun**

6 Ağu 2023 06:51 GMT-7

hello, will my money be refunded or will the transaction continue? can we return it?

[iOS için Outlook' uygulamasını edinin](#)

**Nicole** (Please use claims.ftx.com)

1 Ağu 2023 10:42 GMT-7

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<https://ftexchange.zendesk.com/hc/en-us/articles/16738866768788-Filing-a-Customer-Claim>



Tümünü Yanıtla

1



Posta



Takvim



Uygulamalar

20:31

4G



ents, reply to this email.



Nicole (Please use claims.ftx.com)

16 Ağu 2023 05:12 GMT-7

Hello,

Are you still having an issue with filing your claim,
or was it successful?

Best,

FTX Customer Support



ilhan uzun

15 Ağu 2023 11:21 GMT-7

I applied for proof, it's
true

[iOS için Outlook uygulamasını edinin](#)



Nicole (Please use claims.ftx.com)

7 Ağu 2023 06:40 GMT-7



Tümünü Yanıtla



Posta



Takvim



Uygulamalar

20:32

4G

**Nicole** (Please use claims.ftx.com)

7 Ağu 2023 06:40 GMT-7

Hello,

Please feel free to contact ftxinfo@ra.kroll.com
with any questions in regard to the Kroll claim
process.

Best,

FTX Customer Support

**ilhan uzun**

6 Ağu 2023 06:52 GMT-7

Yada Türkçe cevap verin daha iyi olur

[iOS için Outlook](#) uygulamasını edinin**ilhan uzun**

6 Ağu 2023 06:51 GMT-7

hello, will my money be
refunded or will the
transaction continue? can
we return it?



Tümünü Yanıtla



Posta



Takvim



Uygulamalar